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December 23, 2024

**Via ECF**

The Honorable Jessica G. L. Clarke, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**MEMO ENDORSED**

Re: *Rivero et al v. Glenco Contracting Group Inc,*  
Case No.: 23-cv-11087 (JGLC)

Dear Judge Clarke:

We are counsel to Plaintiffs in the above-referenced case. We write, jointly with Defendants, to provide a status update regarding the parties October 28, 2024, mediation. As the parties advised in their November 14, 2024, letter to the Court, Plaintiffs intend to enforce the resolution of this matter reached at mediation, if needed.

Plaintiffs propose the briefing schedule below regarding their motion to enforce:

- Plaintiff to move to enforce on or before January 24, 2025.
- Defendants to submit any opposition briefing on or before February 14, 2025.
- Plaintiff to file any reply briefing on or before February 21, 2025.

Additionally, as the Court is considering the pending motion to enforce, the parties request that (i) the stay in this matter be lifted, (ii) that the three outstanding motions [ECF 28, ECF 34, and ECF 40] be re-opened, and (iii) that the discovery deadlines entered in the April 3, 2024, Case Management Plan be extended by the 179 days (from June 24, 2024, until December 20, 2024) of this matter's stay. The new end of fact discovery deadline would be moved 179 days from its original January 31, 2025, date to July 29, 2025.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ C.K. Lee

C.K. Lee, Esq.

cc: all parties via ECF

Application GRANTED. The Court adopts the briefing schedule outlined above for any motion to enforce the parties' mediation resolution. Should Plaintiff file such motion, the parties shall renew their request in a joint letter to the Court by **January 31, 2025** indicating whether they still seek the above requested relief during the pendency of the enforcement motion. The Clerk of Court is further, and respectfully, directed to terminate ECF No. 60 as MOOT.

Dated: December 26, 2024  
New York, New York

SO ORDERED.

*Jessica Clarke*

JESSICA G. L. CLARKE  
United States District Judge